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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
One Ararat Boulevard
Harrisburg, Pennsylvania 17110
(717) 657-4588
August 27, 1986

Mr. Donald M. Black
Regional Compliance Manager
McKesson Chemical Company
309 State Street
P.O. Box 266
North Haven, CT 06473

Re: Closure Plan
McKesson Chemical Company
Hummelstown, PA
I.D. #PAD 014231005

Dear Mr. Black:

We have reviewed the Closure Plan submitted to this office for the closure of the above referenced storage area at the McKesson Chemical Company, Hummelstown, PA. The Closure Plan as proposed is satisfactory and is hereby approved.

Upon completion of closure activities, you are requested to submit to this office certification, both by the owner (McKesson Chemical Company) and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved Closure Plan.

Thanking you for your cooperation.

Sincerely,

Robert G. Benvin

Robert G. Benvin
Facilities Supervisor
Harrisburg Regional Office

RGB:ARM:flw

CLOSURE PLAN

Operator

McKesson Chemical Company
North Railroad Street
Hummelstown, Pennsylvania 17036

I.D. No. PAD014231005

Owner

McKesson Corporation
One Post Street
San Francisco, California 94104

REVISED AUGUST, 1986

Closure Plan

McKesson Chemical Company

Hummelstown, Pennsylvania

INTRODUCTION

This McKesson Chemical Company facility holds Interim Status with the state of Pennsylvania's Department of Environmental Resources and the USEPA for the storage of 110 55-gallon drums of the following hazardous wastes:

F001

F002

F003

F004

F005

D001.

However, wastes were stored at the facility on only three occasions -- during the period between January, 1984, and February, 1985 (see following Table). Because of the obvious lack of commercial activity and the fervent objection of both the town government and the local populace, McKesson management has decided to cease its hazardous waste activities and to yield the facility's Interim Status with both the state and the USEPA. Both Region III of the Usepa and the Harrisburg district office of the PADER were so notified on November 13, 1985 (the Part B applications pending before these two organizations are effectively withdrawn). Because the PADER has authorization from the USEPA, this Plan is directed to the Harrisburg district office of the PADER.

1/24/85
1/24/85

TABLE I
WASTES STORED AT MCKESSON CHEMICAL COMPANY FACILITY
Hummelstown, Pennsylvania

<u>DATE RECEIVED</u>	<u>NO. OF 55-GALLON DRUMS</u>	<u>WASTE NUMBER</u>	<u>WASTE</u>
1/31/84	12	D001	Isopropanol
10/19/84	14	F001	Methylene Chloride
1/17/85	17	F001	Methylene Chloride

STORAGE

All drums of these waste solvents were stored in 55-gallon containers on pallets inside the storage area identified in the original Part A (see page 4) and the subsequent Part B application. The floor of the area is concrete, and has been maintained free of gaps and cracks by filling in all fissures with solvent-proof epoxy resin as they occurred. None of the fissures or cracks extended all the way through the concrete.

STORAGE (cont'd)

However, to ensure that no waste has ever penetrated the concrete, two borings through the concrete in the vicinity of the sealed fissures will be made and samples of the underlying soil taken. These will be analyzed for the hazardous wastes stored on the pad -- isopropanol and methylene chloride. The borings and subsequent analytical work will be carried out by Right Lab Services of Middletown, Pennsylvania, observing all DER- and EPA-required procedures.

The maximum number of 55-gallon drums stored in the area was 17. The inventory at the time of closure was zero.

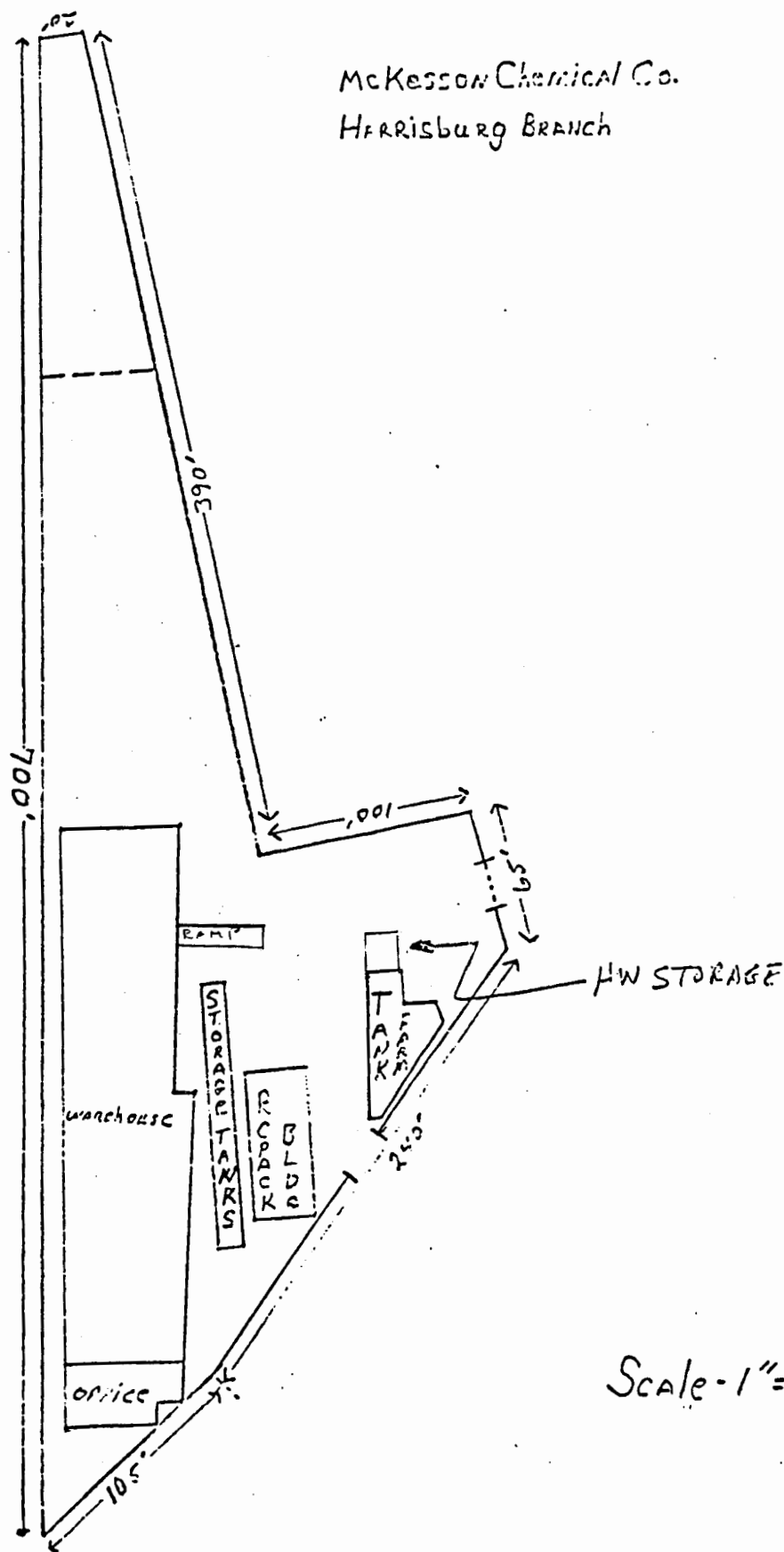
CLEANING

In order to demonstrate that no residual traces of the stored wastes remain, the following cleaning procedure will be followed:

1. The entire storage area will be subjected to a thorough steam-cleaning, using equipment already at the facility; the condensate will be collected in the sump in the north-east corner of the area.
2. The contents of the sump will be sampled for analysis for isopropanol and methylene chloride, and the remaining condensate pumped into a suitable container for storage until analytical results are available.
3. The process will be repeated in order to demonstrate the cleanliness of the area.

Closure Plan -- McKesson Chemical Company, Hummelstown, Pennsylvania
Page 4.

McKesson Chemical Co.
Harrisburg Branch



Scale - 1" = 80'

STORAGE (cont.d)

The cleaning operation will be observed by, and samples taken and analyzed by, a representative of Right Lab Services, Inc., of Middletown, Pennsylvania. Proper chain-of-custody procedures will be followed, and all analytical work will observe the procedures outlined in the USEPA manual, SW-846.

Because the storage area is curbed, no leaking of the steam condensate from the edges of the concrete onto the surrounding soil can occur during the cleaning process.

DATE OF CLOSURE

All closure efforts, including the analytical work, will be completed within 45 days after this plan receives approval. Customers of the facility have been notified that the facility will no longer receive and store their wastes. The effective date of closure is 1986. Upon closure, the storage area will revert to general yard storage of virgin industrial solvents in palletized 55-gallon drums.

CLOSURE COSTS

As required by the Hummelstown Part B application pending with the PADER, McKesson has established a Surety Bond for closure in the agreed-upon amount of \$26,123.00. Because this figure is based upon

10/1/88
10/2/88

CLOSURE COSTS (cont'd)

a "worst possible case" which will not obtain, and because the only expenses foreseen are those connected with the cleaning and analytical procedures outlined previously plus the final certification by a Pennsylvania-certified professional engineer, an actual cost of \$3090.00 appears reasonable:

1. Concrete area cleaning -- Labor: 6 hours @ \$15	\$60
2. Consultant costs -- Sampling, analyses	\$1000
3. Administration -- Travel, telephone, supervision, etc.	\$500
4. Certification -- Pennsylvania-licensed engineer	\$500
5. Contingency -- 50% of Sub-total	<u>\$1030</u>
TOTAL	\$3090

CERTIFICATION

Upon completion of the program outlined above, certification by both McKesson Chemical Company and an independent Pennsylvania-licensed professional engineer will be submitted to the Pennsylvania Department of Environmental Resources.